



## Doyon, Limited

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May 24, 2006

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Room TW-B204  
Washington, DC 20554

**Re: Oral Ex Parte Presentation**  
**WT Docket No. 05-211**  
**AU Docket No. 06-30**

Dear Ms. Dortch:

I am writing to give notice of an oral *ex parte* presentation in WT Docket No. 05-211 and AU Docket No. 06-30.

On May 22, 2006, Orie Williams, President and CEO of Doyon, Limited ("Doyon"), and I met with Commissioner Tate, Aaron Goldberger, and Dana Shaffer. In that meeting, we relayed Doyon's views regarding some of the problems created for designated entities under the Second Report and Order (FCC 06-52) in WT Docket No. 05-211 (Second Report and Order).

We noted that the new ten year unjust enrichment schedule adopted in the Second Report and Order makes it more difficult for designated entities to secure financing and find strategic partners because it is less likely that they can easily exit the business in the event of significant changes in the industry. The rules change as impacted our ability to find equity and strategic partners and to obtain bank financing of our transactions.

We explained that Doyon is one of 13 Alaska Native Regional Corporations (originally 12) organized pursuant to the Alaska Native Claims Settlement Act of 1971 ("ANCSA"). Doyon has over 14,000 Alaska Native shareholders who are peoples from the interior of Alaska. Many of Doyon's shareholders have limited cash incomes and live a subsistence lifestyle, obtaining a significant part of their food from seasonal hunting, fishing and gathering. The ten year unjust enrichment schedule makes it difficult for Doyon to provide for liquidity in its telecommunications investments if it is needed to pay dividends to its Alaska Native shareholders.

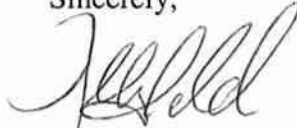
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In addition, we explained that the FCC's new restrictions on spectrum wholesaling killed off one of Doyon's most promising opportunities. We had worked for over a year on a project to build a new state-of-the-art wireless network, but it was only possible if the designated entity had the ability to wholesale capacity beyond the new limits established by the Second Report and Order. As a result of the new wholesaling rules, that opportunity suddenly is no longer viable.

During our meeting with Commissioner Tate and her staff, we stated that Doyon would prefer to see the Second Report and Order rescinded. In the alternative, we recommend rescinding the new ten year unjust enrichment schedule and the wholesaling rules.

One copy of this letter is being submitted electronically pursuant to Section 1.1206(b)(2) of the Commission's Rules. See 47 C.F.R. § 1.1206(b)(2).

Sincerely,

A handwritten signature in dark ink, appearing to read 'A. Todd', with a stylized flourish at the end.

Allen M. Todd  
General Counsel